

## Memorandum 2014-56

**Trial Court Unification: Publication of Legal Notice  
(Public Comment)**

---

In this study, the Commission<sup>1</sup> is focusing on the statutes that call for publication of legal notice in a “judicial district” (i.e., a former municipal or justice court district). Upon consolidation or unification of the courts in a county, the previously existing judicial districts were no longer relevant for their primary purposes of court administration and judicial elections. The boundaries of the former districts, which remain relevant for notice purposes, have become difficult for affected persons to determine. The Commission is considering how to revise the notice publication statutes to ensure that the provisions achieve local notice in a more workable manner.

The Commission approved a tentative recommendation for release in September.<sup>2</sup> To provide context for the discussion that follows, this memorandum begins by providing a brief summary of the tentative recommendation. After that summary, the memorandum discusses the public comment received on the tentative recommendation.

The following materials are attached for the Commission’s consideration:

- |   | <i>Exhibit p.</i> |
|---|-------------------|
| • James Ewert, California Newspaper Publishers Ass’n (10/29/14) . . . . .                           | 1                 |
| • Daniel Pone, Judicial Council of California (10/28/14) <sup>3</sup> . . . . .                     | 3                 |
| • CLRC staff, chart entitled “Changes in the Number of Judicial Districts in Each County” . . . . . | 6                 |
| • Map of Former Judicial District Boundaries in Los Angeles County . . . . .                        | 8                 |

---

1. Any California Law Revision Commission document referred to in this memorandum can be obtained from the Commission. Recent materials can be downloaded from the Commission’s website ([www.clrc.ca.gov](http://www.clrc.ca.gov)). Other materials can be obtained by contacting the Commission’s staff, through the website or otherwise.

The Commission welcomes written comments at any time during its study process. Any comments received will be a part of the public record and may be considered at a public meeting. However, comments that are received less than five business days prior to a Commission meeting may be presented without staff analysis.

2. Minutes (Sept. 2014), p. 3.

3. This communication was also attached to an earlier memorandum. See First Supplement to Memorandum 2014-51. It is provided again here, for ease of reference.

The staff's summary and analysis of the comments is presented below.

In addition, at its October meeting, the Commission received oral input on the tentative recommendation. After hearing public comments, the Commission directed the staff to conduct further research into the practicability of determining the former judicial district boundaries. This memorandum presents the results of that inquiry.

The memorandum concludes by discussing alternative approaches that the Commission might take in addressing the issue of judicial district notice publication.<sup>4</sup>

Except as otherwise indicated, all citations to code sections in this memorandum refer to the Government Code.

#### SUMMARY OF TENTATIVE RECOMMENDATION

The tentative recommendation explains that in the past, the "judicial districts" referred to in the notice publication statutes were primarily used for court elections and court business. With the elimination of the municipal and justice courts, judicial districts were no longer needed for those purposes. Nonetheless, judicial districts remain relevant for specifying the location of publication of certain notices.

Section 71042.5 provides that upon consolidation of judicial districts, the former component districts are preserved for notice purposes. On the Commission's recommendation, Section 71042.5 was amended to extend the same principle to trial court unification, preserving the prior municipal districts for notice publication purposes. The Commission viewed this as a temporary solution, and the Legislature therefore directed it to revisit the matter in the future.

Based on the Commission's research and public input thus far, it appears that the existing approach to publication of legal notices in a judicial district has become cumbersome and confusing. In particular, a person publishing a legal notice may have difficulty determining the boundaries of the judicial district in which publication must occur.

The tentative recommendation is intended to address the perceived problems. Consistent with the scope of the Commission's authority, the proposed

---

4. See discussion of "Options for Moving Forward" *infra*.

legislation seeks to improve the status quo without disturbing the longstanding legislative policy of providing notice locally.

Specifically, the tentative recommendation proposes to:

- (1) Redesignate the judicial districts used for publishing legal notice as “public notice districts.”
- (2) Replace “judicial district” with “public notice district” in statutes that require publication of legal notice in a judicial district.
- (3) Require that the boundaries of each public notice district be maintained on a publicly accessible state agency website.
- (4) Designate the Judicial Council as the custodian of that information.
- (5) Delete obsolete provisions referring to judicial districts.
- (6) Make technical changes to the statutes in question.

#### PUBLIC COMMENT

The Commission received written comments from the California Newspaper Publishers Association and the Judicial Council. Those groups also testified at the Commission’s October 2014 meeting. Their comments are discussed further below.

#### **California Newspaper Publishers Association**

The California Newspaper Publishers Association (“CNPA”) submitted a letter expressing its support for the Commission’s tentative recommendation.<sup>5</sup> CNPA notes that judicial districts “have served and continue to serve a very important function: they are used to achieve the Legislature’s objective of ensuring that information about important events or occurrences in a less-than-countywide, local community is likely to reach those who have an interest in the event or occurrence.”<sup>6</sup>

CNPA’s letter highlights two components of the tentative recommendation, which it appears to consider important aspects of the proposal. First, CNPA points out that the Commission’s proposal “recognizes the importance of using existing district boundaries as the basis of creating newly drawn public notice districts.”<sup>7</sup> Second, CNPA “appreciates the inclusion of [the] provision” preserving the status of a newspaper that is currently recognized as a newspaper

---

5. Exhibit, pp. 4-51-2.

6. *Id.* at 41.

7. *Id.* at 2.

of general circulation in a particular judicial district, because that approach avoids disrupting the status of established newspapers of general circulation.<sup>8</sup>

Finally, CNPA states that it and its members are available to assist the Commission in resolving the concerns raised about the tentative recommendation.<sup>9</sup>

### **Judicial Council**

The Judicial Council opposes the tentative recommendation.<sup>10</sup> The memorandum summarizes Judicial Council's views below, and then provides some preliminary staff remarks.

#### *Judicial Council's Perspective*

In general, the Judicial Council is concerned that the task of determining judicial district boundaries is not straightforward and ministerial. It suggests that this determination will be expensive at a minimum and perhaps impossible if perfect fidelity to the boundaries dictated by Government Code Section 71042.5 is the goal. From both an operational and fiscal perspective, the Judicial Council says it is not well-positioned to take on the task of determining the boundaries.

More specifically, the Judicial Council makes the following points:

- (1) *Access to boundary information generally.* The Judicial Council says that selection of it to serve as custodian of the boundary information is "based on an incorrect and unfounded assumption" regarding its access to historical information regarding judicial district boundaries.<sup>11</sup> The Judicial Council states that it "historically has had no role in or responsibility for compiling or maintaining judicial district boundary information or maps, nor does it have any authority over the county governmental entities that have had this longstanding, statutory obligation."<sup>12</sup>
- (2) *Access to county records.* The Judicial Council says that transferring the custodian duties to it would be unworkable, because it has no authority over the counties and the Commission's proposal "does not contain a process for the counties to certify the [public notice district] boundary information, nor does it impose a corresponding obligation on the counties to transfer such information to the council."<sup>13</sup>

---

8. *Id.* at 2.

9. *Id.* at 2.

10. Exhibit, pp. 3-5.

11. *Id.* at 3.

12. Exhibit pp. 3-4.

13. *Id.* at 4.

- (3) *Gaps in the record.* According to the Judicial Council, “the tentative recommendation fails to adequately address the significant operational problems ... that are presented when individual counties are either unable to produce any [public notice] district boundary information whatsoever, or are unable to do so in a readable and accessible format.”<sup>14</sup> In other words, “the Commission’s proposal provides no guidance or method for how the Judicial Council ... would handle requests for [public notice] district boundary information in cases where such information is not obtainable or impossible to access in a reliable fashion.”<sup>15</sup>
- (4) *Fiscal considerations.* The Judicial Council has not yet conducted a formal fiscal analysis of the Commission’s proposal, but it believes that the proposal would require it to incur “significant and ongoing” costs.<sup>16</sup> The Judicial Council also points out that the proposal does not identify a source of funding for the costs of compiling the boundary information.<sup>17</sup> It further reports that it “does not currently have the requisite staff and resources to take on this significant new program, and it is unlikely that it would be able to do so in the foreseeable future given the ongoing fiscal crisis facing the council and the entire branch.”<sup>18</sup>
- (5) *Choice of custodian of boundary information.* Finally, the Judicial Council maintains that in the current era of limited resources, “continued county-by-county maintenance of [public notice district] boundary information seems a more practical solution” than reassigning that role to the Judicial Council.<sup>19</sup> The Judicial Council points out that (i) such an approach would spread the costs of the program across 58 counties, (ii) each county already has a website where it could “post whatever information it has available regarding the judicial districts it is already required to maintain,” (iii) county personnel are likely to be more familiar with the locales in question, and (iv) “[s]ince the main function of notice by publication is to target notice to a *less-than-countywide, local* population that is intended to receive it, keeping the obligation of maintaining the [public notice] district boundary information at the county level and requiring the counties to post it online, while not ideal, appears to us to be the most practical and cost-effective method of addressing the underlying problem.”<sup>20</sup>

---

14. *Id.*

15. *Id.*

16. *Id.*

17. *Id.*

18. *Id.*

19. *Id.*

20. *Id.* at 4-5.

### *Preliminary Staff Remarks*

In response to the concerns raised by the Judicial Council, the staff offers the following preliminary remarks:

- (1) *Access to boundary information generally.* While the Judicial Council does not have direct access to county records relating to judicial district boundaries (i.e., the maps prepared by counties pursuant to Section 71042.6 and county ordinances establishing or modifying judicial districts), it appears to be better situated than any other state agency to access relevant court records. As discussed further below, the courts presumably needed to know the judicial district boundaries and may have records describing those boundaries.
- (2) *Access to county records.* The Judicial Council's concerns about obtaining district boundary information from the counties could be addressed by adding a statutory requirement that counties make the relevant records available and certify their authenticity. Such a requirement would arguably impose a state mandated local program, but the cost of compliance would likely be de minimis.<sup>21</sup>
- (3) *Gaps in the record.* The Judicial Council is understandably concerned about how to proceed if some boundary information is unavailable. As discussed later in this memorandum, the staff's research suggests that authoritative information on historical district boundaries is likely to be available in some form. Even if a map required by Section 71042.6 cannot be found, the county ordinances that created or modified the former judicial districts should be available. However, accessing archival copies of superseded historical ordinances could be time-consuming.
- (4) *Fiscal considerations.* The upfront research costs of compiling district boundary information could be significant, especially if it is necessary to research archival county ordinances or other sources to fill gaps in the record. There might also be significant costs involved in translating existing boundary descriptions into a uniform and user-friendly format. The cost of hosting the resulting boundary descriptions on a website would probably be modest. The associated cost of answering any public inquiries directed to the custodian entity are too speculative to estimate. There would likely be some cost, but the staff cannot predict its magnitude. Regardless, the Judicial Council indicates that it does not have the resources to take on this work at this time. The Commission should take that into account in deciding how to proceed.
- (5) *Choice of custodian of boundary information.* While the Judicial Council has identified some reasons for having the counties serve as custodians of the boundary information, there are also good

---

21. See Gov't Code § 17564 (reimbursable state mandated local costs must exceed \$1,000).

reasons to recommend that a state agency perform the task. The necessary legal analysis would only have to be performed once by a single entity, rather than reiterating the analysis in each of the 58 counties. Moreover, the results could be presented in a uniform format at a single location, making it more user-friendly for statewide entities that must post notices in several counties. And, as discussed above, any new duty imposed on counties could require reimbursement of costs under the law governing state mandated local programs.

## BOUNDARY DETERMINATION

At the October 2014 meeting, the Commission directed the staff to do further research on how difficult it would be to determine the boundaries of the historical judicial districts that are used for notice publication.<sup>22</sup> The results of that inquiry are discussed below.

### **Governing Statutory Law**

As noted earlier, Section 71042.5 generally provides that when judicial districts are “consolidated,” the former component districts are nonetheless preserved for the purposes of notice publication:

Notwithstanding any other provision of law, where judicial districts in a county have been consolidated, or where the municipal and superior courts in a county have unified, the territory embraced within the respective prior component judicial districts shall be separate judicial districts for the purpose of publication within a judicial district.

Section 71042.5 was enacted in 1967.<sup>23</sup> The provision was not intended to apply retroactively.<sup>24</sup>

Section 71042.6 was enacted in the same bill that added Section 71042.5.<sup>25</sup> It requires counties to prepare and maintain a map showing the relevant districts for notice publication:

71042.6. For the purpose of establishing boundaries under Section 71042.5, a map approved by the county surveyor shall be kept on file with the county recorder showing the boundaries of all

---

22. Minutes (Oct. 2014), p. 4.

23. 1967 Cal. Stat. ch. 1066.

24. 1967 Cal. Stat. ch. 1066, § 2 (As enacted in that legislation, Government Code Section 71042.6 provided in part “[s]uch map and boundaries shall be applicable to any consolidation which becomes effective on or after the effective date of this section.”).

25. 1967 Cal. Stat. ch. 1066.

consolidated or unified districts and component districts as of the date of consolidation or unification. The map shall be conclusively presumed to be accurate and may be used in evidence in any proceeding involving application of Section 71042.5.

The intended effect of Sections 71042.5 and 71042.6 seems clear — prevent the weakening of “localness” that would result if districts are consolidated into a small number of larger districts. District consolidation appears to have been a trend at that time.<sup>26</sup>

Sections 71042.5 and 71042.6 limit that kind of dilution of localness, by effectively preventing the consolidation of districts for the purposes of notice publication.

### **Issues Relating to Operation of Section 71042.5**

Section 71042.5 does not define the term “consolidate.” However, given the apparent purpose of the section<sup>27</sup> and the general definition of the word,<sup>28</sup> it seems fairly clear that consolidation occurs when two or more districts are combined to produce a smaller number of districts.

This leaves open the possibility that judicial district boundaries could be changed in a way that would *not* be a consolidation under Section 71042.5. The boundaries between districts could be *moved*, without the districts being *combined*. For example, former Government Code Section 71040.1 automatically adjusted the boundaries of a judicial district to reflect any territory annexed to a city (i.e., the annexed territory would be added to the judicial district containing the city that expanded).<sup>29</sup>

By its terms, Section 71042.5 only operates when a consolidation occurs. At that time, it appears that the pre-consolidation component districts would have

---

26. “In the period since June 30, 1958 there has been a net decrease of 54 judicial districts, reflecting a decline of 66 justice court districts which was partly offset by an increase of 12 municipal court districts.

...

The trend towards fewer justice courts principally reflects two factors: (1) population growth which results in the creation of municipal courts as district populations increase to levels exceeding the 40,000 constitutional limit for justice courts; and (2) local redistricting resulting in the consolidation of separate justice court districts into either municipal court districts or larger justice court districts.” Judicial Council of California, Annual Report of the Administrative Office of the California Courts 58-59 (January 8, 1968).

27. See Memorandum 2014-15, pp. 4-8.

28. “To join or combine together into one thing.” <http://www.merriam-webster.com/dictionary/consolidate>.

29. See 1955 Cal. Stat. ch. 1360, § 1.



their boundaries frozen for notice publication purposes. Districts that had not yet been consolidated would not be frozen, meaning that their boundaries could still be changed (so long as the change was not the result of a consolidation).

That possibility (the prospect that some districts within a county can be frozen when other districts in the county are not) could lead to difficulties. Suppose that a county contains two adjacent judicial districts, A and B. As the result of a consolidation, the boundaries of A are frozen, while the boundaries of B remain subject to change. The county decides to change the borders of B, without consolidating it into another district. In one place, the border of B is moved to include territory that falls within former district A. In another place, the border of B is moved away from former district A, leaving territory that is not in district B nor the former district A. Section 71042.5 does not provide clear answers on how to address those kinds of boundary mismatch.

The staff does not yet know whether any such problems actually exist. But if they do, they could present conflicts that cannot be resolved through strict adherence to Section 71042.5. This would make the determination of boundaries a non-ministerial task, requiring some discretion to adjust boundaries where necessary.

On a related point, if the staff is correct in construing Section 71042.5 as operating incrementally — freezing only those districts that have been consolidated — then the task of determining boundaries using Section 71042.6 maps may be complicated. Suppose that a county consolidated two of its judicial districts in 1970. Section 71042.6 would require the preparation of a map showing the prior component districts that are to be used for notice publication under Section 71042.5. Suppose that the county then consolidated two more of its districts in 1980. Presumably, a second map would need to be prepared. This would mean that a county could have multiple maps, which might need to be read together to give a full account of the history of consolidation.

### **Primary Sources of Boundary Information**

There appear to be two primary sources of information about the boundaries of the former judicial districts that are used for notice publication under Section 71042.5:

- *The maps prepared by counties pursuant to Section 71042.6.* These maps are deemed by law to be correct.

- *County ordinances that create or modify judicial districts.* Such ordinances are the law on which the county maps should have been based. In the absence of a map, county ordinances would be another source of dispositive legal authority.

Each type of source is discussed further below.

It is worth noting that the boundaries are likely to be described differently in the different sources. For example, Section 71042.6 requires the preparation of a *map* of the boundaries, while the county ordinances reviewed by staff have included *textual* descriptions. For that reason, any reconciliation of the two sources may be time-consuming.

To get a sense of the difficulty of determining the relevant district boundaries, the staff sought maps and ordinances for 12 sample counties (Butte, Contra Costa, Fresno, Kern, Lake, Los Angeles, Mendocino, Modoc, San Bernardino, Siskiyou, Trinity, and Yolo). These counties were selected to provide a mix of urban and rural counties, as well as a range of population levels. Throughout the remainder of this memorandum, these will be referred to as the “sample counties.”

#### *County Maps*

Where available, the county maps prepared pursuant to Section 71042.6 are the best authority for determining the relevant district boundaries for notice publication. Section 71042.5 provides that such maps are “conclusively presumed to be accurate.”

However, to the extent that a map is not detailed enough to resolve all questions about boundary locations, it may be insufficient to fully describe the territory within a district. In such cases, a researcher would need to consult other sources of information.

Moreover, there are reasons to wonder about the accessibility of the county maps. Previously, the Commission received public comment regarding the accessibility and usability of the maps in several counties.<sup>30</sup> Specifically, Erin King (Executive Director of the California Self-Storage Association) sought maps of judicial districts in five counties. She received maps or access to maps in four of the five counties.

---

30. See Memorandum 2014-15, Exhibit pp. 1-3.

Ms. King found that these maps could not necessarily be accessed quickly. She reported that one county took 20 days to respond to her request.<sup>31</sup> In another case, she submitted a Public Records Act request, waited 13 days, and was then told no map existed.<sup>32</sup> In one instance, Ms. King had to visit the office of the county recorder in person to view the map.<sup>33</sup>

Ms. King found that the maps were difficult to use. She noted generally that the maps she reviewed “wouldn’t provide much help at all if my self storage facility fell near a boundary line. They were all difficult to read and lacked real details....”<sup>34</sup>

In preparing this memorandum, the staff mailed requests for Section 71042.6 maps to county recorders in the twelve sample counties. At this point, the staff has received one response, from Los Angeles County. The staff was emailed an electronic copy of the map of former judicial districts from the Los Angeles County Registrar-Recorder/County Clerk. A small-scale copy of the map is attached as an exhibit to this memorandum.<sup>35</sup> The staff will update the Commission at the December meeting as to the status of the remaining inquiries.

#### *County Ordinances*

Former Government Code Section 71040 stated:

71040. As public convenience requires, the board of supervisors shall divide the county into judicial districts for the purpose of electing judges and other officers of municipal and justice courts, and may change district boundaries and create other districts. No city or city and county shall be divided so as to lie within more than one district.<sup>36</sup>

Thus, when judicial districts were used for court administrative and jurisdictional purposes, the board of supervisors was charged with the responsibility of setting the judicial district boundaries.<sup>37</sup> Most likely, the judicial district boundaries would have been established by ordinance and codified in county codes. Indeed, several county codes still include judicial district boundary

---

31. *Id.* at p. 1.

32. *Id.* at p. 3.

33. *Id.* at p. 1.

34. *Id.* at p. 1.

35. Exhibit, p. 8. Note – this reproduction is intended solely for illustrative purposes. The map file received by staff is quite large and in color. Details that may be obscured in the Exhibit may be clear in the source file.

36. See 1953 Cal. Stat. ch. 1130, § 1.

37. *Id.*

descriptions.<sup>38</sup> The staff also found evidence that other counties previously had judicial district boundary descriptions in their codes, but have since repealed them.<sup>39</sup>

Using county ordinances to determine the relevant district boundaries may not be straightforward. To the extent that ordinances describe boundaries textually, it may be necessary to translate those descriptions into maps in order to fully understand what they describe. Moreover, a researcher would probably need to find all of the ordinances affecting a county's judicial district boundaries since 1967 and work forward through time to determine whether and when districts were consolidated (or boundaries were changed in ways that did not involve a consolidation). In other words, there would likely be some complicated historical tracing required.

County ordinance research might be further complicated by differences in how each county expresses, organizes, and archives its ordinances.

For the twelve sample counties, the staff first searched the county codes and ordinances online to determine whether the judicial district information might be readily available from these resources. Nine of the sampled counties currently have judicial district boundary information in their codes.<sup>40</sup> However, in all cases, the staff was unable to access historical boundary information back to 1967.

This suggests that a researcher would need to use archival copies of older county ordinances, in order to do the necessary historical tracing. The staff has made inquiries with county law libraries in the sample counties and with the State Archives, but has not yet found a source for archival county ordinances. We are currently checking with the relevant county clerks.

While the *current* county ordinances are probably not sufficient to determine the relevant boundaries under Section 71042.5, they do provide some indication

---

38. See, e.g., Los Angeles County Code of Ordinances §§ 1.20.010 to 1.20.260; Orange County Code of Ordinances §§ 1-5-2 to 1-5-7. See also Siskiyou County Code of Ordinances § 2-5.14 (apparently describing some pre-consolidation judicial districts).

39. See, e.g., Riverside County Ordinance No. 381.9 (eff. Aug. 27, 1992), repealed by Ordinance No. 798 (eff. Nov. 25, 1999).

40. See, e.g., Los Angeles County Code of Ordinances §§ 1.20.010 to 1.20.260. Of the 12 sampled counties, the following counties' codes currently contain judicial district boundary information: Butte, Contra Costa, Fresno, Lake, Los Angeles, Modoc, Siskiyou, Trinity, and Yolo. Orange County, while not one of the sampled counties, also includes boundary information in its code. See *infra* note 51.

of the potential challenges involved in using county ordinances as a source for boundary information.

One practical consideration is that the different counties use different methods to describe district boundaries. For instance, Contra Costa County refers to election precincts,<sup>41</sup> while Siskiyou County uses township and range designations.<sup>42</sup> Fresno County describes one of its districts as including specified former component districts, without reiterating the boundaries of the former districts.<sup>43</sup> Los Angeles County uses a variety of different methods, including centerlines of roads,<sup>44</sup> references to boundaries shown on specific maps held by the county recorder,<sup>45</sup> and right of ways.<sup>46</sup> Overall, the lack of consistency in how boundaries are described increases the difficulty of understanding the territories being described.

For the reasons discussed above, the use of county ordinances as a source is feasible but potentially difficult and time-consuming.

### **Secondary Sources of Boundary Information**

In addition to the primary sources discussed above, the staff sees three sources of secondary information that could shed useful light on the historical judicial district boundaries:

- *Reports that list all judicial districts in each county and name the cities and other locations contained within the districts.* While these reports do not describe precise boundaries, they help provide useful context for the interpretation of boundary descriptions.

---

41. See Contra Costa County Code of Ordinances §§ 28-2.002 to 28-2.022.

42. See Siskiyou County Code of Ordinances §§ 2-5.01 to 2-5.03, 2-5.14.

43. Fresno County Code of Ordinances § 2.24.015.

44. See, e.g., Los Angeles County Code of Ordinances § 1.20.100(B) (“Beginning at the intersection of the centerline of Imperial Highway and the boundary of the city of Santa Fe Springs (along Shoemaker Avenue); thence easterly along said centerline of Imperial Highway to the boundary of the city of La Mirada ....”).

45. See, e.g., *id.* § 1.20.080 (“Beginning at the northwesterly corner of Block A of Watts Park Tract, as shown on map recorded in Book 8, page 70, of Maps, in the office of the Recorder of the County of Los Angeles; thence easterly along the northerly line of said block to the boundary of the city of Lynwood....”).

46. See, e.g., *id.* § 1.20.030 (“...thence westerly along township line to the southeast corner of Section 32, Township 4 North, Range 14 West, S.B.M.; thence northerly along section lines to the southeasterly right-of-way line of the Antelope Valley Freeway; thence northeasterly along said southeasterly right-of-way line to the range line between Ranges 13 and 14 West S.B.M.; thence northerly along range line to the northwesterly right-of-way line of the Antelope Valley Freeway; thence southwesterly along said northwesterly right-of-way line to the east line of Section 17, Township 4 North, Range 14 West, S.B.M. ....”).

- *Statutory indicia.* Some code provisions address judicial districts in ways that could indirectly help to determine the district boundaries.
- *Court administrative records.* Because historical judicial districts were used for court administrative and jurisdictional purposes, courts must have had a basis for understanding their own district boundaries. Archival court records may include information relevant to the determination of the former district boundaries.

### *Judicial District Reports*

In preparing this memorandum, the staff has located reports that provide, on a periodic basis, lists of all judicial districts within the state. Some of these reports were prepared by the Judicial Council; others were prepared by the Association of Municipal Court Clerks.<sup>47</sup> The staff consulted various editions of these reports. They generally include, at a minimum, the names of all of the judicial districts within a particular county. Some contain additional information, including the location of courthouses within the districts, a list of the cities or communities within each district, and information on recent consolidations of districts. While the reports generally do not describe district boundaries,<sup>48</sup> they can be used to form a rough understanding of the areas encompassed within the districts.<sup>49</sup>

A table is attached to this memorandum showing how the numbers of judicial districts within each county have changed over time.<sup>50</sup> Some useful information can be drawn from that data:

- It appears that seven counties had only one county-wide judicial district for the entire relevant timeframe (Alpine, Amador, Mono, San Francisco, Santa Cruz, Sierra, and Ventura). Once this is

---

47. See, e.g., Judicial Council of California, Annual Report of the Administrative Office of the California Courts (Jan. 8, 1968); K.J. Arnold, California Courts and Judges Handbook (1968); Association of the Municipal Court Clerks of California, California Courts Directory and Fee Schedules (1966-1967 ed.).

48. One exception is for judicial districts that are fully described by municipal or county boundaries. See, e.g., *id.* at 13 (the Burbank Municipal Court Judicial District's geographic area is "[c]o-extensive with the city limits of Burbank.") Many judicial districts contain some unincorporated territory. See, e.g., *id.* at 24 (the Santa Barbara-Goleta Municipal Court Judicial District's geographic area is "[t]he cities of Goleta and Santa Barbara and closely adjacent unincorporated areas.").

49. See, e.g., Association of the Municipal Court Clerks of California, California Courts Directory and Fee Schedules (1966-1967 ed.). For instance, the San Bernardino Municipal Court Judicial District's geographical area is described as "[t]he City of San Bernardino and the unincorporated towns of Del Rosa, Verdemon, Devore, Muscoy, Wrightwood, and a portion of Patton and Harlem Springs." *Id.* at 21.

50. Exhibit, pp. 6-7.

confirmed, no further research would be required for those counties.

- Similarly, in Orange County, there were no consolidations during the relevant period — the number of judicial districts remained constant. This strongly suggests that the notice boundaries for Orange County are those specified in its current county code.<sup>51</sup>
- For 23 counties, there may have been only a single consolidation event during the relevant timeframe (Calaveras, Colusa, Del Norte, Glenn, Imperial, Inyo, Kings, Lassen, Marin, Mariposa, Merced, Napa, San Benito, San Luis Obispo, Santa Clara, Sonoma, Stanislaus, Sutter, Tehama, Trinity, Tuolumne, Yolo, and Yuba). This strongly suggests that determining the relevant notice district boundaries in those counties should be relatively straightforward.
- In three instances, there appears to have been an *increase* in judicial districts within a county. Kern, Madera, and Nevada Counties all showed an increase in number of judicial districts in the interval from 1978 to 1988.
- For most of the counties with multiple judicial districts in 1968, the first consolidation of boundaries appears to have occurred in the interval between 1968 and 1978. Thus, for these counties, at least some of the relevant notice boundaries are pre-1978 boundaries. Determining notice district boundaries in these counties will likely involve the type of archival research and historical tracing described above.

In summary, these numbers indicate that the relevant district boundaries should be readily determinable in eight counties (as they are either coextensive with the county's boundaries or are described in the current county code). For the remaining 50 counties, some historical research could be required to trace the history of district consolidations within the relevant timeframe.

#### *Statutory Indicia*

Some California code provisions contain language that could indirectly help in determining the general location of certain districts. For instance, former Government Code Section 71045 required that the Board of Supervisors select a name for each judicial district in its county “which as nearly as possible identifies

---

51. See Orange County Code of Ordinances §§ 1-5-2 to 1-5-7.

the communities embraced in the district.”<sup>52</sup> Thus, the district names should provide a clue as to the location of the district.<sup>53</sup>

In addition, many former code sections referred to individual judicial districts by name (for instance, code sections authorizing positions for judges and staff in the courts in those districts).<sup>54</sup> Beyond that, the staff has come across a few former code sections that give additional information about the location of a particular judicial district, either by reference to former component district names<sup>55</sup> or by listing cities and areas in a particular district.<sup>56</sup>

#### *Administrative Records of Courts*

While the courts did not have an official role in maintaining the judicial district boundaries, the boundaries were important for administrative and jurisdictional purposes.<sup>57</sup> In addition, the judicial district boundaries appear to be directly at issue in certain proceedings. For example, the courts are sometimes called on to certify that a newspaper is a newspaper of general circulation in a particular judicial district.<sup>58</sup> There may also be cases that involve a claim that a notice was published in the wrong district. To address such matters, a court must have been able to determine judicial district boundaries.

The staff has not yet contacted the superior courts in the sample counties, to ask about the availability of records relating to the former judicial districts. The staff felt that the primary sources discussed above were the higher priority, as they would be dispositive if located. The staff was also mindful of the resource limitations of the courts and did not want to impose unless it became necessary to do so.

---

52. See former Gov’t Code § 71045 (1953 Cal. Stat. ch. 206, § 1).

53. But see Judicial Council of California, Annual Report of the Administrative Office of the California Courts 189 (Jan. 8, 1968) (Tuolumne’s justice court districts are named First, Second, Third, Fourth, and Fifth).

54. See, e.g., former Gov’t Code § 72602 (1975 Cal. Stat. ch. 1102, § 1) (listing the number of judges by judicial district for each municipal court in Los Angeles County).

55. See, e.g., former Gov’t Code § 73390 (1990 Cal. Stat. ch. 1327, § 2).

56. See, e.g., former Gov’t Code §§ 71040.6 (1980 Cal. Stat. ch. 676, § 139), 74740 (1986 Cal. Stat. ch. 1125, § 10).

57. See generally K.J. Arnold, California Courts and Judges Handbook §§ 2.35-2.36, 2.71, 2.72, 2.77-2.82 (1968).

58. See Gov’t Code §§ 6020-6027.



## OPTIONS FOR MOVING FORWARD

If the Commission decides to stick with the general approach taken in the tentative recommendation (maintaining the existing district-based system, with minor improvements to make the law easier to use) the staff sees two general alternative ways to proceed:

- Determine the relevant historical boundaries solely as a matter of *ministerial* research and the description of existing law.
- Preserve the existing districts to the extent that it makes sense to do so, but retain *discretion* to reform the law where appropriate (e.g., to resolve ambiguities, modernize, and improve ease of use).

Those alternatives are discussed further below.

### **Ministerial Determination**

This is the approach taken in the tentative recommendation. The expectation was that the Judicial Council would determine the existing boundaries by applying the governing law to the historical records. The point was to illuminate the existing district boundaries, rather than change them.

Judicial Council objects to the cost of conducting the necessary research and analysis. It is also concerned that the work cannot be done on a wholly ministerial basis. There may be gaps in the record that would need to be filled. That would require an exercise of policy discretion.

The staff expects that the county maps and ordinances, supplemented with secondary sources, would provide enough information to determine the boundaries of most of the relevant districts. However, the staff cannot rule out the possibility that there may be irreconcilable gaps in the record. This is a shortcoming of the approach taken in the tentative recommendation.

It also seems likely that the process of determining the boundaries with perfect fidelity to the governing law could be time-consuming and difficult. If maps are missing or ambiguous, a researcher would need to conduct comprehensive historical tracing based on county ordinances. Those sources may exist only as archived hard copy records. Accessing such records may require visits to county record storage facilities. This too is a shortcoming of the ministerial approach taken in the tentative recommendation.

In addition, there may be problems that arise from Section 71042.5 itself. As discussed above, there could be situations where the boundaries of districts that were never consolidated (and were therefore never “frozen”) could be changed

in ways that create inconsistencies with the boundaries of neighboring frozen districts. Section 71042.5 provides no guidance on how to resolve such inconsistencies. This would leave unresolved questions about the relevant boundaries that could not be resolved ministerially.

Some of the problems described above could perhaps be resolved by refinements to the proposed law. For example, the proposed law could include language prescribing a rule for the resolution of specific types of problems. To the extent that problems are anticipated and addressed in that way, the need for an exercise of discretion could be minimized.

The staff sees four implementation problems with that approach and one policy concern. The implementation problems are as follows:

- (1) It is not clear how a rule could be crafted to address a genuine gap in the historical record.
- (2) The Commission may fail to anticipate all of the problems that exist, in which case the attempt to make the task wholly ministerial would fall short.
- (3) The need to thoroughly research the historical record in order to perfectly describe the boundaries that are in effect under existing law would be costly. The addition of some guidance on how to resolve difficult cases could help to reduce that cost, but probably not by much.
- (4) The boundaries prescribed by Section 71042.5 may not actually match up with existing practices and expectations. To the extent that existing practices are out of synch with the legally mandated boundaries, adherence to the 1967 districts could create practical problems without any obvious countervailing benefit.

The policy concern is that a wholly ministerial approach to the determination of the relevant boundaries would foreclose any possibility of making minor substantive improvements. Perfect adherence to the governing law could produce some results that do not make sense under modern conditions.

For example, the general rule was that a city could not be divided between two or more judicial districts.<sup>59</sup> This makes practical sense, because it is much easier to describe the boundaries of a judicial district if they follow municipal borders rather than cutting through the middle of a city. It also makes policy sense if the goal is to provide notice within an affected community as a whole. If cities are fractured into multiple notice districts, notices may not reach everyone

---

59. See former Gov't Code § 71040.6 (1980 Cal. Stat. ch. 676, §139).

who would be interested in the subject of the notice. Under Section 71042.5, there does not seem to be any way to adjust the boundaries of a frozen district to reflect the annexation of territory into an existing city or the creation of a new city in a formerly unincorporated area. Either of those events could result in a district boundary that cuts through the middle of a city. It would be better to avoid that result if possible.

It may also be the case that the number of districts that existed in a county in 1967 does not make sense under modern conditions. While the Commission may want to presume that the number of districts that existed in 1967 is appropriate, as a way of maximizing localness, there may be situations where the presumption could be convincingly rebutted. If so, it might make sense to adjust the number of districts and the corresponding boundaries to achieve a more reasonable distribution.

Finally, in some cases the existing boundaries may be so complicated that they make the law very hard for the public to understand and use. There may be ways to simplify the existing boundary descriptions so as to significantly increase the usability of the system, without problematically disrupting existing expectations.

Despite those reservations, the Commission could decide to preserve the ministerial approach taken in the tentative recommendation, but add statutory rules to address foreseeable problems. **If the Commission wishes to pursue that option, the staff would prepare possible refinements for consideration at a future meeting.**

**If that approach is taken, the Commission may wish to reconsider its choice of an entity to perform the research task.** A different state entity could be chosen or the task could be kept with the counties. On balance, the staff believes that the Commission made the right choice in recommending that a stage agency perform the task. The efficiencies of a centralized and uniform implementation seem to outweigh the easier access that counties would have to their own records.

### **Nonministerial Reform**

The discussion above highlights a number of shortcomings of a purely ministerial approach:

- The research costs involved in achieving a perfect description of the legally mandated boundaries may be high.

- Perfect description may not be possible, due to a gap in the necessary historical records.
- There may be inconsistencies between the boundaries of neighboring frozen and unfrozen districts that cannot be resolved by application of Section 71042.5.
- Existing law may produce other irreconcilable conundrums that the staff has not yet anticipated.
- The existing boundaries may divide cities in problematic ways.
- Some 1967-era districts may not be suitable for modern conditions.
- Some 1967-era boundaries may not match existing practices and expectations.
- The complexity of some district boundaries may make the law very difficult for the public to understand and use.

All of those problems could probably be avoided or minimized if the task were framed to include some degree of nonministerial reform.

It would probably still make sense to use the Section 71042.5 districts as a starting point, to best preserve existing law and expectations. But where perfect continuity of the 1967-era boundaries would be prohibitively difficult to achieve, or would produce problems of the types described above, simplifying changes could be made.

It seems likely that this approach would significantly reduce research costs, because gaps could be filled and problematic corners rounded in ways that would simplify the boundary determination process.

It also seems likely that this approach would present opportunities for substantive improvement of the law. Boundaries could be rationalized in ways that would make the system easier to use. For example, because of the general rule that judicial districts could not split cities, nearly all of the judicial districts can be described as a list of the cities that a district contains, plus any associated unincorporated area.

One possibility is that a reformed system of notice boundaries could be described using this “city plus” approach. In other words, the legal description of each district would consist of a list of cities, plus any associated unincorporated area. This approach would greatly simplify use of the law by the public. City boundaries are fairly easy to determine using online resources or materials readily available in libraries. Moreover, most people already know whether their homes or businesses are located within a city, and if so, which one.

The staff sees three potential problems with the nonministerial reform approach:

- (1) If the reform task is assigned to a government agency by statute, how would the task be described? In other words, what would be the nondiscretionary component, and what matters would be within the agency's policy discretion?
- (2) How would the result of the reform be legitimized? Would the result need to be promulgated as an administrative regulation? Or would legislation need to be introduced to codify the boundaries?
- (3) If the task involves *revision* of the law, rather than a mere *description* of the law, would it be appropriate for the Commission to delegate the task to another entity? The Legislature has charged the Commission with addressing defects in the current judicial district notice statutes. If the task requires substantive reform of the law, that would seem to fall within the Commission's traditional area of responsibility.

With those concerns in mind, if the Commission decides to pursue a nonministerial reform approach it might make sense for the Commission to simply do the work itself. Not only would the task be within the scope of the existing study, the Commission currently has a much greater understanding of the relevant law and practical issues than any other entity to which the task might be referred.

Furthermore, while it might be difficult to draft statutory language assigning the task to another entity (because of uncertainty as to how to distinguish the discretionary and nondiscretionary elements of the task), there would be no need to wrestle with that problem if the Commission were to perform the work itself. The Commission could express the goals of the project in less constraining terms, and those goals could evolve if need be, to address unanticipated complications.

Whichever entity would perform the task, the staff sees some benefit in having the resulting boundary descriptions codified into law. Codification would provide a straightforward and low cost way of making the boundary descriptions available to the public. Affected private interests could provide links to the codified boundary descriptions on the Internet, along with guidance on how they are to be used. It might also make sense to require counties to provide links to the provisions governing districts within their own territories. That could be a fairly simple way to distribute the information to the relevant locales.

**If the Commission decides to take a nonministerial reform approach, it should decide whether to perform the work itself or instead recommend that it**

**be assigned to another entity.** If the Commission decides to keep the task, the staff will begin the necessary work. If the Commission decides to recommend that another entity perform the task, the staff will develop language to do so, for consideration at a future meeting.

#### CONCLUSION

The Commission needs to decide how to proceed. The two general alternatives are summarized below:

- (1) If the Commission decides to take the ministerial approach, consistent with the general thrust of the tentative recommendation, the staff will develop possible refinements to the proposal to address foreseeable problems. The Commission would also need to consider whether the task should be performed by a state agency or distributed among the 58 counties. That decision could be made now, or it could wait until the Commission has decided how to further refine the parameters of the task.
- (2) If the Commission decides to reframe the task as a nonministerial reform, it will need to decide whether to perform the work itself or recommend that it be performed by another entity. If the Commission decides to do the task itself, the staff will begin work. If the Commission decides that another entity would be a better choice to do the work, the staff will prepare possible language to describe the task, for consideration at a future meeting.

**How does the Commission wish to proceed?**

Respectfully submitted,

Kristin Burford  
Staff Counsel



# CALIFORNIA NEWSPAPER PUBLISHERS ASSOCIATION

## CNPA Services, Inc.

2000 O Street, Suite 120, Sacramento, CA 95811 • Ph: 916.288.6000 • Fax: 916.288.6002 • www.cnpa.com

October 29, 2014

NOV 3 2014

California Law Revision Commission  
4000 Middlefield Road, Room D-2  
Palo Alto, CA 94303-4739  
Attention: Kristin Burford

**RE: Tentative Recommendation on Trial Court Unification: Publication of Legal Notice**

Dear Chairperson King and Commissioners:

I am writing to you on behalf of the California Newspaper Publishers Association to express the Association's support of the Commission's Tentative Recommendation on Trial Court Unification: Publication of Legal Notice.

Among the many complexities involved with the Legislature's unification of the courts in 1998 was the unresolved issue of what to do with the Judicial Districts that would no longer be used by the courts. Judicial Districts were not only used by the courts for elections or to determine the appropriate jurisdiction for certain matters, but also used by those who were legally required to publish public notices.

For public notice purposes, Judicial Districts have served and continue to serve a very important function: they are used to achieve the Legislature's objective of ensuring that information about important events or occurrences in a less-than-countywide, local community is likely to reach those who have an interest in the event or occurrence.

Over the years, though, officials at the county level who have the legal duty to create and maintain the Judicial District maps have failed to keep the maps current and have made it difficult for the public to locate them. This has created confusion among those persons required to publish legal notices.

The tentative recommendation addresses this problem.

The revisions proposed in the recommendation would replace the term "judicial district" with "public notice district" in statutes that require publication of legal notice in a judicial district and require that information about the boundaries of each public notice district be maintained in a central, statewide repository. In creating the central statewide repository, the proposal designates the Judicial Council as the custodian of that information.

Another important component in the proposal is that it recognizes the importance of using existing district boundaries as the basis of creating newly drawn public notice districts. CNPA understands that, in proposing the tentative recommendation, the Commission sought to respect the legislature's longstanding preference for local publication.

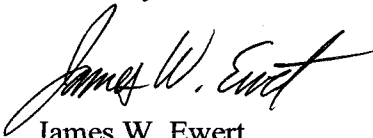
The proposed recommendation also preserves the status of a newspaper that is currently recognized under the law as a newspaper of general circulation in a particular judicial district. CNPA appreciates the inclusion of this provision in the proposal as it will safeguard that the transition to public notice districts will not disrupt the status of a newspaper of general circulation in a former Judicial District.

If adopted and introduced in the Legislature the Tentative Recommendation will clarify the existing statutory scheme for providing public notices and ensure that the Legislature's objective of providing targeted public notice of significant events in a community will continue to be realized.

We understand that Judicial Council has concerns about the provision that charges the Council with maintenance of the maps and operating as the central repository for this information. CNPA and its members have expertise in dealing with public notices and are available to assist you and your staff as the Commission seeks to address the concerns Judicial Council has raised.

CNPA commends your staff for the thoroughness of its work on this issue and we applaud your efforts that led to the proposed Tentative Recommendation. We look forward to working with you and your staff in support of the legislation that is ultimately introduced to obtain the Governor's signature.

Sincerely,



James W. Ewert  
CNPA General Counsel

cc: Roger Coover, CNPA President, Publisher *The Record*, Stockton  
Julie Xanders, CNPA Governmental Affairs Committee Chairwoman, General Counsel, Tribune Publishing Company  
Thomas W. Newton, CNPA Executive Director  
Scott Merrill, CNPA Staff Attorney





## JUDICIAL COUNCIL OF CALIFORNIA

770 L Street, Suite 1240 • Sacramento, California 95814-3368  
Telephone 916-323-3121 • Fax 916-323-4347 • TDD 415-865-4272

TANI G. CANTIL-SAKAUYE  
*Chief Justice of California*  
*Chair of the Judicial Council*

MARTIN HOSHINO  
*Administrative Director*

CORY T. JASPERSON  
*Director, Governmental Affairs*

October 28, 2014

California Law Revision Commission  
4000 Middlefield Road, Room D-2  
Palo Alto, CA 94303-4739  
Attention: Kristin Burford, Staff Counsel

RE: CLRC Tentative Recommendation, Trial Court Unification: Publication of Legal Notice  
(September 2014) – Judicial Council Opposition

Dear Chairperson King and Members:

The Judicial Council regrets to inform you of its opposition to the California Law Revision Commission's September, 2014 Tentative Recommendation on Publication of Legal Notice. The council's opposition to CLRC's tentative recommendation is based on a number of significant operational and fiscal concerns, which are detailed below.

First, the Commission's proposal to designate the Judicial Council as the custodian of the information about the boundaries of each public notice district is based on an incorrect and unfounded assumption that the council "would have ready access to historical information on judicial district boundaries." (Tentative Recommendation at p.10.) As CLRC staff have noted, the judicial district boundaries that are the focus of this proposal are, and always have been, maintained at the *county* level.<sup>1</sup> The Judicial Council historically has had no role in or responsibility for compiling or maintaining judicial district boundary information or maps, nor

---

<sup>1</sup> See Govt. Code sec. 71042.6, which provides "[f]or the purpose of establishing boundaries under Section 71042.5, a map approved by the county surveyor shall be kept on file with the county recorder showing the boundaries of all consolidated or unified districts and component districts as of the date of consolidation or unification. The map shall be conclusively presumed to be accurate and may be used in evidence in any proceeding involving application of Section 71042.5."

does it have any authority over the county governmental entities that have had this longstanding, statutory obligation.

Second, switching this statutory obligation from the counties to the Judicial Council would appear to be unworkable. As noted above, the council has no authority over the counties. In addition, CLRC's proposal as presently drafted does not contain a process for the counties to certify the publication notice boundary information, nor does it impose a corresponding obligation on the counties to transfer such information to the council.

Third, the tentative recommendation fails to adequately address the significant operational problems, which were well-recognized by the Commission's staff, that are presented when individual counties are either unable to produce any publication notice district boundary information whatsoever, or are unable to do so in a readable and accessible format. After performing a quick check of several county recorder websites, CLRC staff stated in one of its study memoranda that "it appears these maps are, at a minimum, not easy to find online and may not be available online at all." The staff memo continues by noting that "staff time and resources may be required to answer inquiries about the maps and provide the maps upon request." However, the Commission's proposal provides no guidance or method for how the Judicial Council (or any other entity for that matter) would handle requests for publication district boundary information in cases where such information is not obtainable or impossible to access in a reliable fashion.

Fourth, although the Judicial Council has not yet conducted a formal fiscal analysis of CLRC's proposal, the costs to the council for complying with these new statutory mandates are likely to be significant and ongoing. CLRC staff acknowledges that "exhaustive research" will likely be required in an effort to compile the publication notice boundary information for the entire state. However, the Commission's proposal lacks an identified source of funding for this purpose. The Judicial Council does not currently have the requisite staff and resources to take on this significant new program, and it is unlikely that it would be able to do so in the foreseeable future given the ongoing fiscal crisis facing the council and the entire judicial branch.

Finally, although we are understand the Commission's overall goal in having a statewide resource for publication notice boundary information, it does not appear to be feasible for the Judicial Council to assume this responsibility at the present time. In the current era of limited resources, and in the absence of an identified alternative statewide resource, continued county-by-county maintenance of publication notice boundary information seems a more practical solution. Each county already has its own website, and should be able to post whatever information it has available regarding the judicial districts it is already required to maintain. This approach has the advantage of spreading the costs of the program across 58 counties, rather than the Judicial Council or any other statewide entity having to bear all of the costs. Moreover,

personnel at the county level should be more familiar with the locales at issue rather than a staff member at one central location (e.g., the Judicial Council's main office in San Francisco). Since the main function of notice by publication is to target notice to a *less-than-countywide, local* population that is intended to receive it, keeping the obligation of maintaining the publication district boundary information at the county level and requiring the counties to post it online, while not ideal, appears to us to be the most practical and cost-effective method of addressing the underlying problem.

For these reasons, the Judicial Council opposes the tentative recommendation. However, we remain available to consult with Commission members and its staff in a cooperative effort to explore alternative approaches to addressing the underlying problem in a more cost-efficient and workable manner.

Respectfully,

A handwritten signature in black ink, appearing to read "Daniel Pone", written in a cursive style.

Daniel Pone  
Senior Attorney

cc: Members, Policy Coordination and Liaison Committee, Judicial Council  
Mr. Martin Hoshino, Administrative Director, Judicial Council  
Mr. Cory Jasperson, Director, Governmental Affairs, Judicial Council

## CHANGES IN THE NUMBER OF JUDICIAL DISTRICTS IN EACH COUNTY

<b>County</b>	<b>Judicial Districts as of Jan. 1, 1968<sup>1</sup></b>	<b>Judicial Districts as of Jan. 1, 1978<sup>2</sup></b>	<b>Judicial Districts as of Jun. 30, 1987<sup>3</sup></b>	<b>Judicial Districts as of Jun. 30, 1996<sup>4</sup></b>
Alameda	7	6	6	6
Alpine	1	1	1	1
Amador	1	1	1	1
Butte	6	5	2	2
Calaveras	3	1	1	1
Colusa	2	1	1	1
Contra Costa	13	4	4	4
Del Norte	2	1	1	1
El Dorado	4	4	3	1
Fresno	15	9	9	2
Glenn	2	2	1	1
Humboldt	5	5	3	1
Imperial	8	1	1	1
Inyo	2	1	1	1
Kern	11	2	6	4
Kings	4	4	4	1
Lake	5	5	3	1
Lassen	3	1	1	1
Los Angeles	26	25	25	24
Madera	3	2	4	1
Marin	2	1	1	1
Mariposa	2	1	1	1
Mendocino	10	9	7	1
Merced	8	1	1	1
Modoc	4	2	1	1
Mono	1	1	1	1
Monterey	10	5	1	1
Napa	3	1	1	1

1. Data derived from Judicial Council of California, Annual Report of the Administrative Office of the California Courts 195-198, 246-255 (Jan. 6, 1969).

2. Data derived from Judicial Council of California, Annual Report of the Administrative Office of the California Courts 154-158, 215-219 (Jan. 1, 1979).

3. Data derived from Judicial Council of California, Annual Report of the Administrative Office of the California Courts 226-227, 232-233 (1988).


























4. Data derived from Judicial Council of California, Annual Report of the Administrative Office of the California Courts 159-164 (1997).

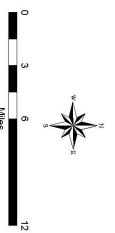
<b>County</b>	<b>Judicial Districts as of Jan. 1, 1968</b>	<b>Judicial Districts as of Jan. 1, 1978</b>	<b>Judicial Districts as of Jun. 30, 1987</b>	<b>Judicial Districts as of Jun. 30, 1996</b>
Nevada	3	2	3	1
Orange	5	5	5	5
Placer	7	7	2	1
Plumas	3	2	1	1
Riverside	14	5	5	4
Sacramento	4	4	2	2
San Benito	3	1	1	1
San Bernardino	19	12	5	1
San Diego	8	4	4	4
San Francisco	1	1	1	1
San Joaquin	4	3	3	3
San Luis Obispo	5	1	1	1
San Mateo	3	2	1	1
Santa Barbara	6	6	4	2
Santa Clara	6	6	1	1
Santa Cruz	1	1	1	1
Shasta	9	4	4	1
Sierra	1	1	1	1
Siskiyou	8	5	5	1
Solano	6	3	3	2
Sonoma	4	1	1	1
Stanislaus	7	1	1	1
Sutter	2	1	1	1
Tehama	2	2	2	1
Trinity	5	1	1	1
Tulare	8	7	7	1
Tuolumne	5	5	5	1
Ventura	1	1	1	1
Yolo	12	1	1	1
Yuba	3	1	1	1
<b>TOTAL</b>	328	198	166	109



LOS ANGELES COUNTY  
REGISTRAR-RECORDER/  
COUNTY CLERK

## FORMER JUDICIAL DISTRICT BOUNDARIES

DISTRICT BOUNDARIES	
 ALHAMBRA	 LOS ANGELES
 ANTELOPE	 LOS CERRITOS
 BEVERLY HILLS	 MALIBU
 BURBANK	 NEWHALL
 CITRUS	 PASADENA
 COMPTON	 POMONA
 CULVER	 RIO HONDO
 DOWNEY	 SANTA ANITA
 EAST LOS ANGELES	 SANTA MONICA
 GLENDALE	 SOUTH BAY
 INGLEWOOD	 SOUTHEAST
 LONG BEACH	 WHITTIER
 Communities	



THIS MAP WAS SUBMITTED TO CHAIRMAN MINOR OF THE  
COMMISSION ON JUDICIAL DISTRICTS BY THE  
COUNTY CLERK OF LOS ANGELES COUNTY, CALIFORNIA  
SECTION 1.1000 TEL. NO. 961-482-2423 FAX. NO. 961-482-2423  
Date: January 1997

